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Attorneys for Plaintiffs and Opt-In Plaintiffs

[Additional Counsel of Record listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, et al., individually and  
on behalf of others similarly situated,  
Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,  
Defendant.

Case No. 3:18-cv-01477-JR

**PARTIES' JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
SECOND REVISED LITIGATION  
DEADLINES**

Pursuant to the Court's April 1, 2021 Order, ECF No. 136, Plaintiffs Kelly Cahill, *et al.* ("Plaintiffs") and Nike, Inc. ("Nike" or "Defendant") (collectively, the "Parties"), through their respective counsel hereby present the following stipulated and agreed upon revised litigation deadlines and request that the Court enter an order regarding the same.

### **STIPULATED REVISED LITIGATION DEADLINES**

The Parties hereby stipulate and agree and request the Court order the following revised litigation deadlines (the prior dates are provided in the first column for ease of reference):

<b>Litigation Deadline</b>	<b>Old Date</b>	<b>Revised proposal</b>
Fact Witness Depositions Close	3/26/21	5/31/21
Plaintiffs' Expert Reports Due	5/10/21	7/15/21
Nike to depose or conduct expert discovery	5/11/21-7/5/21	7/16/21-9/9/21
Nike's Expert Reports Due	7/6/21	9/10/21
Plaintiffs to depose or conduct expert discovery	7/7/21-8/30/21	9/11/21-11/4/21
Plaintiffs' Expert Reply Reports Due	8/31/21	11/5/21
Motion for Class Certification	10/12/21	12/17/21
Opposition to Class Certification	12/14/21	3/4/22
Reply to Class Certification	1/28/22	4/18/22

### **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD**

Dated: April 30, 2021

Respectfully submitted,

GOLDSTEIN, BORGAN, DARDARIAN & HO

/s/ James Kan

Laura L. Ho (admitted *pro hac vice*)  
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Attorneys for Plaintiffs and Opt-In Plaintiffs

Dated: April 30, 2021

Respectfully submitted,

/s/ Felicia A. Davis

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**SIGNATURE ATTESTATION**

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: April 30, 2021

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ James Kan

James Kan (admitted *pro hac vice*)

**[PROPOSED] ORDER**

The Court has reviewed the Parties' Joint Stipulation Regarding Second Revised Litigation Deadlines and hereby enters the same as reflected below.

<b>Litigation Deadline</b>	<b>Revised proposal</b>
Fact Witness Depositions Close	5/31/21
Plaintiffs' Expert Reports Due	7/15/21
Nike to depose or conduct expert discovery	7/16/21-9/9/21
Nike's Expert Reports Due	9/10/21
Plaintiffs to depose or conduct expert discovery	9/11/21-11/4/21
Plaintiffs' Expert Reply Reports Due	11/5/21
Motion for Class Certification	12/17/21
Opposition to Class Certification	3/4/22
Reply to Class Certification	4/18/22

**IT IS SO ORDERED.**

Dated:

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JOLIE A. RUSSO  
United States Magistrate Judge